

UNITED STATE DISTRICT COURT DISTRICT OF RHODE  
ISLAND

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ANDREW C., *by Next Friend* Gregory C. )  
Elliott; MATTHEW R. *by Next Friend* )  
Elaine Macintosh; and SEAN M. *by Next* )  
*Friend* Elaine Macintosh; *for themselves* )  
*those similarly situated,* )

Plaintiffs )

v. )

C.A. No. 1:07-cv-241-WES-PAS

DANIEL J. McKEE, *in his official* )  
*capacity as Governor of the State of Rhode* )  
*Island;* WOMAZETTA JONES, *in her* )  
*official capacity as Secretary of the* )  
*Executive Office of Health & Human* )  
*Services; and* KEVIN AUCOIN, *in his* )  
*official capacity as Acting Director of the* )  
*Department of Children, Youth & Families,* )

Defendants )

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STATE DEFENDANTS' OBJECTION TO PLAINTIFFS' MOTION FOR  
ATTORNEYS' FEES

Now come Daniel J. McKee in his official capacity as Governor of the State of Rhode Island, Womazetta Jones, in her official capacity as Secretary of the Executive Office of Health and Human Services and Kevin Aucoin, in his official capacity as Acting Director of the Department of Children, Youth and Families (hereinafter "State Defendants") and object to Children's Rights Motion for Attorneys' Fees (ECF 613). For the reasons set forth in the accompanying memorandum of law, the State Defendants pray that Children's Rights' Motion for Attorneys' Fees (ECF No. 613) is denied or, in the alternative, substantially reduced in accordance with the controlling

case law.

Respectfully Submitted,

STATE DEFENDANTS

By Their Attorney,

PETER F. NERONHA  
ATTORNEY GENERAL

*/s/ Brenda D. Baum*

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CERTIFICATION

I, the undersigned, hereby certify that I filed the within document via the ECF filing system and that a copy is available for viewing and downloading. I have also caused a copy to be sent via the ECF system to the following attorneys of record on this 17<sup>th</sup> day of November 2021.

*/s/ Brenda D. Baum*